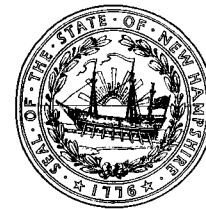




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

LETTER OF DEFICIENCY
WD WWEB/C 06-006

April 26, 2006

Jeremy Lamson, Town Administrator
Town of Pittsfield
P.O. Box 98
Pittsfield, NH 03263

Subject: National Pollutant Discharge Elimination System (NPDES)
Compliance Sampling Inspection (CSI)
Pittsfield WWTF, NPDES Permit # NH0100986

Dear Mr. Lamson:

On March 22, 2006, as a representative of the Department of Environmental Services, Water Division, Wastewater Engineering Bureau (DES), Stephanie Larson conducted a NPDES CSI at the Pittsfield WWTF. Objectives of a CSI include determining compliance with NPDES permit conditions, verifying accuracy of permit required information and adequacy of permittee sampling and monitoring. The following people were present during this CSI:

Ronald Vien, Superintendent, Pittsfield WWTF
Stephanie Larson, Environmental Inspector, DES
Margaret Bastien, P.E. Compliance Engineer, DES

Included are copies of EPA's Water Compliance Inspection Report Form 3560-3 and the sample results for the compliance sampling event. The laboratory results for *Escherichia coli* (E. coli), Carbonaceous Biochemical Oxygen Demand (CBOD₅) and Total Suspended Solids (TSS) were within the allowable permit discharge limitations.

The deficiencies and observations/recommendations DES observed during the CSI are summarized as follows:

Deficiencies (Response Required):

1) pH

- a) Prior to each analysis, personnel calibrate their pH meter with pH buffers 4.0 and 10.0 SU and then analyze a 7.0 SU Quality Control (QC) buffer to verify the calibration. EPA Method 150.1 requires the meter be calibrated at a minimum of 2 points that bracket the expected results of the sample and that the buffers be approximately 3 SU apart. The calibration buffers used are 6 SU apart. Personnel must change their procedure and decrease the range between the two calibration buffers. For example when personnel

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095

Telephone: (603) 271-3503 • Fax: (603) 271-2982 • TDD Access: Relay NH 1-800-735-2964

DES Web site: www.des.nh.gov

expect their pH results to be greater than 7.0 SU the calibration buffers used could be 7.0 and 10.0 SU. When personnel expect their pH results to be less than 7.0 SU, the calibration buffers used could be 4.0 and 7.0 SU. As before, the QC standard analyzed should be between the 2 calibration buffers, such as 8.0 SU and 5.0 SU, respectively.

2) Whole Effluent Toxicity (WET)

- a) The July 2005 WET test did not contain the required 12.5% dilution. Personnel should ensure that all tests are done according to EPA approved analytical methods.

3) Chain-of-Custody (COC)

COCs are the procedures used to protect samples from tampering and the documentation of this protection.

- a) A COC form lists all of the tests a facility wants analyzed. Pittsfield's WET test COC forms do not list the Day 1 effluent and diluent Total Solids, TSS and Ammonia Nitrogen as Nitrogen ($\text{NH}_3\text{-N}$) analyses they wish their contract laboratory to analyze. Personnel should add these parameters to their COC forms.

Repeat Deficiencies (Noted in February 28, 2004 NPDES inspection – Response Required)
If these repeat deficiencies are noted in any subsequent inspection then DES may proceed immediately with formal enforcement action which may include an administrative fine.

4) Discharge Monitoring Reports (DMRs)

Pittsfield personnel have not been correctly completing the DMRs as per EPA's instructions.

- a) Pittsfield personnel incorrectly calculated results in January, March, April, May, June, July, November and December 2005 and February 2006. Corrected and recertified DMRs were submitted with the exception of May, June and November 2005 and February 2006. Please submit corrected and recertified DMRs for these months to DES and EPA.
- b) Personnel do not list the analyst(s) at the bottom of the DMR or in a cover letter. This information is required by the DMR instructions. Since the inspection, personnel have begun reporting this information on their DMRs.
- c) Measured results less than the detection limit or Minimum Level (ML) must be replaced with zero (0) in the DMR calculations. Pittsfield personnel use the actual test results in their calculations. For example, the ML for Total Residual Chlorine (TRC) is 0.05 mg/l. When personnel used the measured TRC results in their August and September 2005 calculations, they reported 0.05 mg/l as the monthly averages. If the measured results <0.05 mg/L where replace with '0' in the calculation, the monthly averages are 0.041 and 0.026 mg/l for August and September, respectively. Personnel should begin using zero '0' in their calculations.
- d) Final results less than the EPA designated detection limit or ML must be reported on your DMR as zero '0'.
- e) Personnel do not record the ML or detection levels for the applicable parameters on their DMRs or in a cover letter as required by your NPDES DMR instructions. Personnel have begun reporting this information on their DMRs.

When signing DMRs, personnel certify that the information reported is true, accurate and complete. Personnel should cross-check their calculations and review their final DMRs to prevent mistakes and misreporting which are violations of your permit.

Corrective Actions Required:

DES requests that Pittsfield describe all steps taken to correct the deficiencies identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. When the response is complete, the responsible official for the municipality or the industry must sign the response. If the submitted response is acceptable to DES and the deficiencies are not repeat deficiencies and/or have not resulted in environmental harm, we will close out the inspection and no further action, other than continued compliance, is required by the permittee. If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.

DES requests that you submit your response to this inspection by **May 26, 2006**. If DES does not receive a complete response signed by the appropriate official within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Stephanie Larson
NHDES-WWEB
P.O. Box 95
Concord, NH 03302-0095

If you have any questions, please call Ms. Larson at (603) 271-1493.

Sincerely,



John R. Bush, P.E.
Administrator
Wastewater Engineering Bureau

Enclosures: EPA Water Compliance Inspection Report Form 3560-3
CSI sampling results

Cc: DES, WD, WWEB/File

Stephanie Larson, Environmental Inspector, WWEB
Margaret Bastien, P.E., Compliance Engineer, DES
Gretchen Hamel, Enforcement Coordinator, DES
Joy Hilton, USEPA Water Technical Unit

CERTIFIED MAIL/RRR: 7099 3400 0018 1294 3707